

FILED

MAY 12 2020

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
CAPE GIRARDEAU

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA, )

) Plaintiff,

v. ) No. 1:20CR00063RLW/ACL

NICHOLAS JOHN PROFFITT, ) 18 U.S.C. § 247(a)(1)

) 18 U.S.C. § 844(h)

) Defendant.

) 18 U.S.C. § 844(i)

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)

**INDICTMENT**

**COUNT I**

THE GRAND JURY CHARGES THAT:

On or about April 24, 2020, in Cape Girardeau County, within the Southeastern Division of the Eastern District of Missouri, **NICHOLAS JOHN PROFFITT**, the defendant herein, through the use of fire, intentionally defaced, damaged, and destroyed religious real property, because of the religious character of the property, to wit: the Cape Girardeau Islamic Center, located at 298 North West End Boulevard, Cape Girardeau, Missouri, and religious fixtures and objects therein. This offense was in and affected interstate and foreign commerce. All in violation of Title 18, United States Code, Section 247(a)(1).

**COUNT II**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 24, 2020, in Cape Girardeau County, within the Southeastern Division of the Eastern District of Missouri, **NICHOLAS JOHN PROFFIT**, knowingly used fire and an

explosive to commit a violation of 18 U.S.C. § 247(a)(1), as set forth in Count One of this Indictment, a felony prosecutable in a court of the United States, in violation of Title 18, United States Code, Section 844(h).

### COUNT III

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 24, 2020, in Cape Girardeau County, within the Southeastern Division of the Eastern District of Missouri, **NICHOLAS JOHN PROFFITT**, the defendant herein, maliciously damaged and destroyed, by means of fire and an explosive, the Cape Girardeau Islamic Center, located at 298 North West End Boulevard, Cape Girardeau, Missouri, a building used in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
UNITED STATES ATTORNEY

ERIC S. DREIBAND  
ASSISTANT ATTORNEY GENERAL

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KEITH D. SORRELL, #38283MO  
ASSISTANT UNITED STATES  
ATTORNEY

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JANEA L. LAMAR  
TRIAL ATTORNEY